

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298**FILED**

04/26/22

01:19 PM

A1907021

April 26, 2022

Agenda ID #20570
Ratesetting

TO PARTIES OF RECORD IN APPLICATION 19-07-021:

This is the proposed decision of Administrative Law Judge Garrett Toy. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's June 2, 2022 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, *ex parte* communications are prohibited pursuant to Rule 8.2(c)(4).

/s/ ANNE E SIMON

Anne E. Simon

Chief Administrative Law Judge

AES:smt

Attachment

Decision **PROPOSED DECISION OF ALJ TOY** (Mailed 4/26/2022)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California
Edison Company (U338E) for
Authorization to Recover Costs
Related to 2017-2018 Drought and
2017 Firestorms and Recorded in the
Catastrophic Event Memorandum
Account.

Application 19-07-021

**DECISION AUTHORIZING SOUTHERN CALIFORNIA EDISON
COMPANY TO RECOVER COSTS RELATED TO THE
CANYON 1 AND 2, CREEK, AND PIER FIRES
RECORDED IN ITS 2017 FIRESTORMS
CATASTROPHIC EVENT
MEMORANDUM ACCOUNT**

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**DECISION AUTHORIZING SOUTHERN CALIFORNIA EDISON
COMPANY TO RECOVER COSTS RELATED TO THE
CANYON 1 AND 2, CREEK, AND PIER FIRES
RECORDED IN ITS 2017 FIRESTORMS
CATASTROPHIC EVENT
MEMORANDUM ACCOUNT**

Summary

This decision grants Southern California Edison Company the authority it requests to recover the capital costs recorded in its 2017 Firestorms Catastrophic Event Memorandum Account, incurred in responding to the 2017 Canyons 1 and 2, Creek, and Pier Fires. As discussed in Decision 21-08-024, the costs related to the Thomas and Rye Fires continue to be denied without prejudice. This decision closes this proceeding.

1. Background

1.1. Factual Background

Due to significantly low amounts of rainfall and snowpack from 2012-2016, California experienced severe drought conditions. As a result of these severe conditions, on January 17, 2014, Governor Brown proclaimed a State of Emergency and “directed state officials to take all necessary actions to prepare for drought conditions.”¹

On June 12, 2014, the California Public Utilities Commission (CPUC or Commission) approved Resolution (Res.) ESRB-4 that ordered California Investor-Owned Utilities (IOUs) to “take practicable measures to reduce the likelihood of fires associated with their facilities” and stated that incremental cost recovery through Catastrophic Event Memorandum Accounts (CEMAs) may be sought.

¹ Southern California Edison (SCE) Application (Application), at 4, quoting Governor Brown’s State of Emergency Proclamation. Exhibit SCE-01 (SCE-01), at 8-9 quoting the Governor’s Proclamation, January 17, 2014.

On April 7, 2017, Governor Brown ended the drought state of emergency but noted ongoing issues with regards to drought-stressed forests.²

Beginning on July 6, 2017, Southern California experienced a series of intense wildfires. As a result of those wildfires, the Governor issued four State of Emergency Proclamations for Southern California:³

- On September 7, 2017, Governor Brown issued an Emergency Proclamation for Madera, Mariposa, and Tulare counties due to the effects of multiple fires, including the Pier Fire;
- On October 9, 2017, Governor Brown issued an Emergency Proclamation for Butte, Lake, Mendocino, Nevada, and Orange Counties due to the effects of multiple fires, including the Canyon 1 and Canyon 2 Fires;
- On December 5, 2017, Governor Brown issued an Emergency Proclamation for Los Angeles County due to the effects of the Creek and Rye Fires; and
- On December 5, 2017, Governor Brown issued an Emergency Proclamation for Ventura County due to the effects of the Thomas Fire.

Between August 2017 and January 2018, these fires burned 352,000 acres in SCE territory and disrupted service to over 52,450 customers.

² Application, at 5.

³ Application, at 6.

**Summary of Pier, Canyon 1, Canyon 2,
Thomas, Creek, and Rye Fires Included in CEMA⁴**

Fire	County	Fire Start Date	Containment Date	Acreage Burned
Pier	Tulare	8/29/2017	9/24/2017	36,566
Canyon 1	Orange	9/25/2017	10/4/2017	2,662
Canyon 2	Orange	10/9/2017	10/17/2017	9,217
Thomas	Santa Barbara and Ventura	12/4/2017	1/10/2018	281,893
Creek	Los Angeles	12/5/2017	12/23/2017	15,619
Rye	Los Angeles	12/5/2017	12/12/2017	6,049

Under the Commission's existing practices, the above-named proclamations allowed SCE to invoke the CEMA in accordance with Public Utilities (Pub. Util.) Code⁵ § 454.9(b) and Res. E-3238 which allow a regulated utility an opportunity to recover any reasonable costs to address the event provided that the costs are incremental to existing allowances in rates.

Section 454.9(b) allows IOUs to recover in rates the costs incurred responding to catastrophic events. Res. E-3238, dated July 24, 1991, authorized SCE to establish CEMA accounts and to record in those accounts the costs of the following: (1) restoring utility service to customers; (2) repairing, replacing, or restoring damaged utility facilities; and (3) complying with governmental agency orders resulting from declared disasters. Res. E-3238 also authorized utilities to record capital-related costs such as depreciation and return on capitalized plant

⁴ Application, at 7-8.

⁵ All references to the "Code" or "Section" shall be to the California Pub. Util. Code.

additions. Among other things, recovery of costs may be limited by consideration of the extent to which losses are covered by insurance, the level of loss already built into existing rates, and possibly other factors relevant to the particular utility and event.⁶

SCE notified the Commission's Executive Director that it had activated the CEMA for the following fires:

Fire	County	Fire Start Date	CEMA Activation Date	Date of CPUC Notification⁷
Pier	Tulare	8/29/2017	8/29/2017	9/15/2017
Canyon 1	Orange	9/25/2017	9/25/2017	11/9/2017
Canyon 2	Orange	10/9/2017	9/25/2017	11/9/2017
Thomas	Santa Barbara and Ventura	12/4/2017	12/4/2017	12/20/2017
Creek	Los Angeles	12/5/2017	12/5/2017	12/20/2017
Rye	Los Angeles	12/5/2017	12/5/2017	12/20/2017

1.2. Procedural Background

On July 31, 2019, SCE filed Application (A.) 19-07-021 requesting that the Commission authorize SCE to recover costs recorded in SCE's CEMA as follows:

- Find reasonable \$78.762 million in Operation and Maintenance (O&M) expenses related to the 2017-2018 Drought Mitigation efforts;
- Authorize SCE to recover approximately \$80.88 million⁸ related to Drought CEMA revenue requirement, and

⁶ Public Advocates Office (Cal Advocates) Opening Brief, at 4, quoting Res. E-3238, at 2.

⁷ See Application, at 9.

⁸ Includes interest and Franchise Fees and Uncollectibles (FF&U) expense. (See SCE Application, at 2.)

transfer the recorded balance in the Drought CEMA O&M subaccount to the distribution sub-account of the Base Revenue Requirement Balancing Account (BRRBA) for recovery in distribution rates, upon the effective date of a final Commission decision in this proceeding;

- Find reasonable \$56.987 million of incremental capital expenditures and \$3.287 million in capital-related expense used as the basis for the revenue requirement recorded in SCE's 2017 CEMA Firestorm capital costs subaccounts; and
- Authorize SCE to continue to record the monthly capital--related revenue requirement in the 2017 CEMA Firestorms subaccounts and transfer the December 31, 2020 recorded balance, estimated to be \$7.6 million, to the distribution sub-account of the BRRBA for recovery in distribution rates.

Protests to the application were filed by the Public Advocates Office of the California Public Utilities Commission (Cal Advocates) and The Utility Reform Network (TURN) on September 5, 2019. A Reply was filed by SCE on September 16, 2019.

A prehearing conference was held on October 29, 2019. On December 6, 2019, a Scoping Memo and Ruling addressing the Scope of the proceeding and other procedural matters was issued.

On July 31, 2020, Cal Advocates served its Report on the Results of Examination of SCE's CEMA Requested Recovery Costs and Testimony. TURN served Opening Testimony on September 11, 2020. SCE served Rebuttal Testimony on October 12, 2020.

On November 4, 2020, the proceeding schedule was updated, cancelling evidentiary hearings per the results of a Meet and Confer Report filed by SCE. Opening Briefs were filed December 3, 2020. Reply Briefs were filed December 17, 2020. On February 26, 2021, the parties jointly filed a Motion to move their testimony into evidence.

A proposed decision was mailed on July 2, 2021. On August 19, 2021, after comments by the parties, Decision (D.) 21-08-024 was issued, allowing SCE to recover its 2017-2018 drought-related CEMA costs but denying without prejudice the CEMA costs related to 2017 wildfires. The Commission determined that SCE had not met its burden of proof and shown that its costs related to the Thomas and Rye Fires were reasonable and recoverable, due to outstanding questions of utility involvement in the ignition of those fires.⁹ The decision denied, without prejudice, the Thomas and Rye fire costs, until SCE could provide additional information in a separate application showing that it acted reasonably in maintaining its equipment in those areas.¹⁰ The decision also directed SCE to file additional testimony, de-aggregating its proposed 2017 CEMA Wildfire Costs by fire, so that costs related to the Canyons 1 and 2, Creek, and Pier Fires could be separately reviewed for reasonableness and recovery, as those fires retained no outstanding question of SCE involvement in the ignition of the fire.¹¹

SCE served its supplemental testimony on November 19, 2021, seeking authorization to recover \$1.457 million in revenue requirement related to incremental capital expenditures of \$3.953 million and incremental capital-related expenses of \$1.176 million, associated with the Canyons 1 and 2, Creek, and Pier Fires through December 31, 2020. No party served supplemental rebuttal testimony. Per Administrative Law Judge (ALJ) ruling, SCE filed a motion to move its testimony into evidence on February 15, 2022. Parties were directed via administrative law judge ruling to request briefing by February 22, 2022. No party requested the opportunity to file additional briefing.

⁹ D. 21-08-024, at 17-18.

¹⁰ *Id.* at 27-28.

¹¹ *Id.* at 27-28.

2. Issues Before the Commission

D. 21-08-024 addressed SCE's proposed recovery of 2017-2018 Drought CEMA costs and denied without prejudice SCE's 2017-2018 CEMA costs related to the Thomas and Rye fires. The following are the remaining issues to be determined in this proceeding:

1. Whether the 2017 Canyons 1 and 2, Creek and Pier firestorm-related costs were associated with complying with government agency orders resulting from declared disasters as required by E-3238;
2. Whether the expenses and capital expenditures for which SCE seeks rate recovery appropriately related to declared disasters, both in terms of geography and the nature of impacts covered by the disaster declarations;
3. Whether SCE's proposed recovery of \$1.457 million in revenue requirement associated with the firestorms are CEMA-eligible costs that are incremental, reasonable, and recoverable;
4. Whether SCE's request to recover \$1.457 million for firestorms is associated with: 1) restoring utility service to customers, and 2) repairing, restoring, or replacing damaged utility facilities;
5. Whether the accounting method(s) used for booking the costs for fire CEMA events is reasonable, justified, and consistent with the law; and
6. Whether SCE's proposed recovery methods of CEMA costs in rates is reasonable, justified, and consistent with the law.

3. Admittance of Testimony and Exhibits into Record

Since evidentiary hearings have not been held in A.19-07-021, there was no opportunity to enter prepared testimony and exhibits into the record. In order to fairly access the record, it is necessary to include all testimony and exhibits served by SCE, TURN, and Cal Advocates. Decision 21-08-024 admitted Exhibits

SCE-01, SCE-02, PAO-1, and TURN-01 into the record. On February 15, 2022, SCE filed a motion to admit its supplemental testimony, marked as exhibit SCE-03, into the record. No party protested the motion. This motion is granted, and exhibit SCE-03 is formally accepted into the record for consideration in this proceeding.

4. SCE's Proposed Costs Are Properly Associated with Declared Disasters

SCE proposes to recover in rates \$1.457 million in 2017 CEMA Firestorm related expenditures. In order for such costs to be eligible for recovery, SCE must meet the requirements laid out in § 454.9 and Res. E-3238. Both § 454.9 and Res. E-3238 require that utilities show that CEMA proposed costs were incurred either restoring utility service to customers, repairing, replacing, or restoring damaged utility facilities, or complying with government agency orders resulting from declared disasters.¹² Res. E-3238 also requires that any costs tracked to the CEMA be “costs associated with truly unusual, catastrophic events,” which it defines as those that have been “declared disasters by competent state or federal authorities.”¹³

As discussed in D. 21-08-024, the Commission finds that the costs spent by SCE were appropriately associated with catastrophic events (in this case, firestorms).¹⁴ SCE's Application and Supplemental Testimony discussed the 2017 Pier, Canyons 1 and 2, Thomas, Creek, and Rye Fires for which it sought cost recovery in its original Application. Governor Proclamations were issued all fires, with SCE subsequently providing the Commission with notification that

¹² § 454.9; Res. E-3238, at 2.

¹³ Res. E-3238, at 2.

¹⁴ D. 21-08-024, at 10-11.

pursuant to Res. E-3238 it was activating the CEMA for tracking of its costs spent responding to those fires.¹⁵ SCE's testimony provided context for the fire costs.¹⁶ SCE's testimony notes that in order to be included in this application, firestorm incremental costs must have been related to the act of restoring service to customers, including the repair, replacement, and restoration of facilities damaged by the 2017 firestorms.¹⁷ SCE discusses in its testimony the costs incurred in conducting these activities, including labor, contractor, equipment and transportation, and material procurement.¹⁸ SCE also notes that it utilizes specific firestorm work order accounting procedures to separately track firestorm-related costs,¹⁹ and reviews the costs prior to CEMA inclusion to validate their relation to the firestorm events.²⁰ SCE also notes that it only included firestorm costs for counties in which the disaster declaration had been made.²¹

No party disputed that the costs proposed in this Application were appropriately incurred by SCE in response to declared disasters or drought conditions. Cal Advocates conducted an independent review²² and "concluded that SCE reasonably supported that the costs were Drought and Firestorm related and thus properly recorded to its CEMA accounts."²³ No party alleged

¹⁵ Application, at 9; Application Workpapers, at 1-11; 50-55.

¹⁶ SCE-01, at 40-47.

¹⁷ SCE-01, at 57.

¹⁸ SCE-01, at 40-47, 64-67.

¹⁹ SCE-01, at 62-63.

²⁰ SCE-01, at 62.

²¹ SCE-01, at 63.

²² PAO-01, at 8.

²³ Cal Advocates Opening Brief, footnote 13, at 4.

the use of inappropriate accounting methods. The Commission therefore finds that the costs proposed in the Application properly have a nexus with the CEMA as required by Res. E-3238.

5. SCE's Proposed Costs Related to 2017 Firestorms are Incremental, Reasonable, and Recoverable

SCE proposes to recover \$1.457 million in revenue requirement associated with 2017 Firestorms, including the Canyon 1 and 2, Pier, and Creek Fires. These costs have been recorded in its 2017 CEMA Firestorm capital costs subaccount. Such costs consist of the monthly capital-related revenue requirement, including depreciation expense, return on rate base, and related taxes. SCE seeks Commission approval to transfer the December 31, 2020, recorded balance in the 2017 CEMA Firestorms subaccount (\$1.457 million) to the distribution subaccount of the BRRBA for recovery in distribution rates.²⁴ These costs are derived from the \$3.953 million in incremental capital expenditures and \$1.176 million in incremental capital-related expenses which SCE incurred responding to these fires.

In considering whether to approve the \$1.457 million in revenue requirement, the Commission must first analyze whether the incremental capital expenditures are appropriate to authorize for cost recovery. In order to be eligible for recovery through the CEMA, costs must be incremental, reasonable, and recoverable.²⁵

²⁴ SCE-03, at 6.

²⁵ See Res. E-3238; § 454.9.

5.1. The Canyons 1 and 2, Creek, and Pier Fire Costs Recorded in the Firestorm CEMA Subaccount are Incremental and Recoverable

In determining whether costs are incremental, we must determine whether the costs are in addition to amounts previously authorized to be recovered in rates.²⁶ As discussed in D. 21-08-024, SCE's costs are appropriately incremental.²⁷ SCE, in its testimony, defined incremental costs with regards to the firestorms as costs that "would not have been incurred 'but for' the Firestorms, and are not funded through existing rates."²⁸

SCE provided a number of factors it considered before determining whether costs were incremental. SCE first compared the actual recorded costs in a specific cost category (in this case, storms) with the amount authorized by the Commission for those specific cost categories.²⁹ SCE's testimony shows that in both 2017 and 2018, SCE incurred more storm-related capital expenditures than it was authorized to collect through rates.³⁰ SCE is not seeking recovery of recorded 2017 CEMA Firestorm operations and maintenance expenses in this application, as SCE's recorded expenses for such costs was lower than it was authorized to collect in 2017.³¹ SCE provided information regarding the types of costs (labor, contractor, equipment) and how it determined whether work of a given type was found to be incremental.³² To ensure recoverability, SCE also limited the costs

²⁶ Res. E-3238, at 2-3.

²⁷ D. 21-08-024, at 18-20.

²⁸ SCE-01, at 57, 61.

²⁹ SCE Opening Brief, at 6.

³⁰ SCE-01, at 58.

³¹ *Id.*

³² SCE-01, at 65-67.

presented to those incurred in the counties in which the State of Emergency Proclamations were made.³³

Historically³⁴ the Commission has considered SCE's authorized storm-related capital and O&M expenses in determining whether CEMA recovery is appropriate for Firestorm related costs. SCE relies on this approach in this Application.³⁵ These costs bear a reasonable relationship to the costs requested in the CEMA. Here, SCE chose not to seek recovery of O&M expenses related to 2017 Firestorms, because SCE's storm O&M expenses in 2017 were lower than what SCE had been authorized to collect in rates.³⁶ For capital expenditures, however, SCE calculated that it had spent almost \$63 million and had been authorized to collect almost \$49 million, a deficit of \$14 million, meaning that SCE had overspent what it had been authorized to collect in rates.³⁷ SCE similarly ran a collection deficit for both storm-related capital and O&M expenses in 2018, in the amounts of \$16 million and \$23 million, respectively.³⁸

As noted in D.21-08-024, we did not find Cal Advocates arguments regarding incrementality persuasive.³⁹ Cal Advocates argued that the Commission should compare SCE's company-wide O&M costs with its firestorm capital-related CEMA expenses, in order to determine whether the expenses are incremental. However, we determined that it is reasonable for SCE to review its

³³ SCE-01, at 63.

³⁴ See D.19-01-006.

³⁵ SCE-01, at 58.

³⁶ SCE-01, at 58.

³⁷ *Id.*

³⁸ *Id.*

³⁹ D.21-08-024, at 19-20.

firestorm CEMA capital expenditure and firestorm CEMA capital-related expense spending as compared to its authorized storm-related capital expenditure costs and authorized storm-related capital-related O&M costs, respectively.

Given the recovery deficit for firestorm related capital expenditures in 2017 and 2018, as well as the incrementality test conducted by SCE for the costs being sought, the Commission finds that SCE's 2017 CEMA Firestorm capital expenditures and capital-related expenses, related to the Canyon 1 and 2, Creek, and Pier Fires, are incremental.

5.2. Canyons 1 and 2, Creek, and Pier Fire Costs Recorded in the Firestorm CEMA Subaccount are Reasonable

SCE discussed in its testimony actions taken to ensure costs incurred related to these firestorms were reasonable. SCE utilized contractors with whom it maintains competitively bid purchase orders and utilized its normal supply chain to obtain supplies.⁴⁰ No party protested the reasonableness of costs related to the Canyons 1 and 2, Creek, or Pier Fires.

The Commission therefore finds the costs incurred by SCE in the response to the 2017 Canyons 1 and 2, Creek, and Pier Firestorms reasonable. The costs related to the Thomas and Rye Fires continue to be denied without prejudice.

5.3. Ratemaking

The Commission finds that the approximately \$3.953 million in incremental capital expenditures and \$1.176 million in incremental capital-related expenses associated with the revenue requirement tracked in the

⁴⁰ SCE-01, at 49.

2017 Firestorm CEMA subaccount through December 31, 2020, related to the Pier, Canyon 1, Canyon 2, and Creek Fires are incremental, reasonable, and recoverable. SCE is therefore authorized to transfer the recorded 2017 CEMA Firestorm capital costs subaccount balance, including interest plus franchise fees and uncollectibles, totaling \$1.457 million as of December 31, 2020, to the distribution sub-account of the BRRBA for recovery in distribution rates, upon the effective date of this decision. SCE is also authorized to continue to record the monthly capital-related revenue requirement in the 2017 CEMA Firestorm capital costs subaccounts.

6. Conclusion

The Commission finds reasonable SCE's incremental capital expenditures and incremental capital-related expenses associated with the Pier, Canyon 1, Canyon 2, and Creek Fires, and associated revenue requirements recorded in SCE's 2017 Firestorm CEMA through December 31, 2020. SCE's request to transfer to the distribution sub-account of the Base Revenue Requirement Balancing Account for recovery in distribution rates the recorded balance of the 2017 CEMA Firestorm capital costs subaccounts as of December 31, 2020, totaling \$1.457 million, is approved. This decision closes this proceeding.

7. Comments on Proposed Decision

The proposed decision of ALJ Garrett Toy in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code. Comments allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure were filed on _____.

8. Assignment of Proceeding

Darcie L. Houck is the assigned Commissioner and Garrett Toy is the assigned ALJ in this proceeding.

Findings of Fact

1. Southern California Edison Company's costs recorded in the 2017 CEMA Firestorm Capital Costs Subaccount were spent on activities restoring utility service to customers, repairing, replacing, or restoring damaged utility facilities, or complying with government agency orders resulting from declared disasters, in response to a disaster declared by competent state authorities.

2. Southern California Edison Company spent more in 2017 on storm-related capital costs than it was authorized to collect in rates.

3. The Public Advocates Office conducted a review of the proposed costs and found no irregularities with the tracking of costs to the CEMA.

Conclusions of Law

1. The disaster declarations issued by Governor Brown constitute events declared to be a disaster by competent state or federal authorities for purposes of Public Utilities Code § 454.9 and Res. E-3238.

2. Southern California Edison Company appropriately used the CEMA to track costs associated with 2017 Firestorm Costs, per the requirements of Public Utilities Code § 454.9 and Res. E-3238.

3. In determining whether costs are incremental, it is reasonable for SCE to compare its Firestorm capital expenditures to its authorized storm-related capital expenditures.

4. Southern California Edison Company's incremental capital expenditures of \$3.953 million and incremental capital-related expense of \$1.176 million, associated with the Canyons 1 and 2, Creek, and Pier Fires revenue requirements tracked in the 2017 Firestorm CEMA, incurred from January 1, 2017, to December 31, 2020, are incremental, reasonable, and recoverable.

5. Southern California Edison Company's proposed rate recovery methods are reasonable.

6. It is reasonable for SCE to seek recovery of CEMA costs through transfer to the BRRBA, for recovery in distribution rates.

7. It is reasonable for SCE to continue to record monthly capital-related revenue requirement in the 2017 Catastrophic Event Memorandum Account Firestorms subaccounts.

8. The accounting methods used for the proposed CEMA costs were reasonable and justified.

9. Southern California Edison Company's proposed cost recovery methods for CEMA Firestorm costs are reasonable.

10. Southern California Edison Company Exhibit SCE-03 should be received into evidence.

11. This proceeding should be closed.

O R D E R

IT IS ORDERED that:

1. Southern California Edison Company (SCE) is authorized to recover revenue requirements associated with SCE's reasonably incurred incremental capital-related expenses of \$1.176 million and incremental capital expenditures of \$3.953 million associated with the Canyons 1 and 2, Creek, and Pier Fires revenue requirements tracked in SCE's 2017 Firestorm Catastrophic Event Memorandum Accounts.

2. Southern California Edison Company is authorized to transfer the recorded balance associated with the Canyons 1 and 2, Creek, and Pier Fires as of December 31, 2020 in the 2017 Firestorms Catastrophic Event Memorandum Accounts, including interest, plus franchise fees and uncollectibles, to the

distribution sub-account of the Base Revenue Requirement Balancing Account for Recovery in distribution rates, upon the effective date of a final Commission decision in this proceeding.

3. The prepared testimony of Southern California Edison Company, consisting of Exhibit SCE-03, is received into evidence.

4. Application 19-07-021 is closed.

This order is effective today.

Dated _____, at San Francisco, California